

**EXHIBIT M**

**Villari, Timothy M.**

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**From:** Wall, Katie L.  
**Sent:** Thursday, May 25, 2023 2:42 AM  
**To:** Joe Satterley; Denyse F. Clancy  
**Cc:** Rasmussen, Mark W.; Torborg, David S.; Villari, Timothy M.  
**Subject:** FW: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence  
**Attachments:** 2023-05-22\_Letter from Wall to Kazan McClain concerning Subpoena and ROG deficiencies.pdf

Joe/Denyse—

I am following up on the Debtor's deficiency letter regarding your discovery responses. To streamline this process, the Debtor proposes that Kazan McClain provide the following outstanding information and/or document requests, and the Debtor will not pursue the remaining deficiencies in your responses in connection with the motion to dismiss.

1. Identify or produce documents sufficient to identify the total number of unfiled Talc Claims. (ROG 1, RFP 1)
2. Identify and produce any settlement demands and/or settlement offers, written or oral, that your firm has made with respect to any individual or group of Talc Claims from January 1, 2019 through present. (ROG 2, RFP 2-3)
3. Documents and Communications between your firm and any law firm or claimant concerning the proposed Plan Support Agreement or the Proposed \$8.9 billion Settlement. (RFP 13)

This proposal does not prejudice the Debtor's rights to pursue its remaining discovery requests in connection with other aspects of this case.

Please let us know if you agree to this proposal.

Thank you,

Katie Lyons Wall ([bio](#))  
Partner  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
2727 N. Harwood Street  
Dallas, Texas 75201  
Office [+1.214.969.4576](#)  
Mobile [+1.972.489.8779](#)

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**From:** Villari, Timothy M. <tvillari@jonesday.com>  
**Sent:** Monday, May 22, 2023 11:48 AM  
**To:** Joe Satterley <jsatterley@kazanlaw.com>; Denyse F. Clancy <DClancy@kazanlaw.com>  
**Cc:** Gordon, Gregory M. <gmgordon@JonesDay.com>; Prieto, Dan B. <dbprieto@JonesDay.com>; Rasmussen, Mark W. <mrasmussen@jonesday.com>; Jones, James M. <jmjones@JonesDay.com>; Gottbrecht, Geoffrey N. <ggottbrecht@jonesday.com>; Erens, Brad B. <bberens@JonesDay.com>; Wall, Katie L. <klwall@jonesday.com>  
**Subject:** In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

Counsel,

Please find the attached correspondence and let the Debtor know when you are available for a meet and confer.

Timothy M. Villari  
Associate

[JONES DAY® - One Firm Worldwide®](#)

2727 N. Harwood St.

Dallas, Texas 75201

Office +1.214.969.5104